

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE JOHNSON & JOHNSON  
TALCUM POWDER PRODUCT  
MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION**

*This Document Relates to All Cases*

**Civil Action No. 3:16-md-2738-  
MAS-RLS**

**MDL No. 2738**

**[PROPOSED] ORDER**

**THIS MATTER** having come before the Court by Plaintiffs' Renewed Motion for Leave to File a Second Amended Master Long Form Complaint pursuant to Federal Rule of Civil Procedure 15(a)(2) and Local Rule 15.1(a), and for good cause shown,

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2023,

**ORDERED** that Plaintiffs' Motion is **GRANTED**; and it is

**FURTHER ORDERED** that Plaintiffs shall file the Second Amended Master Long Form Complaint within 7 days of the entry of this order. All Plaintiff short form complaints filed in this MDL shall be deemed to incorporate the Second Amended Master Long Form Complaint in its entirety. Plaintiffs are not required to amend their short form complaints.

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Hon. Michael A. Shipp, U.S.D.J.